

Maritime Transportation Security Act (MTSA) of 2002
Self-Crediting Exercises for Facilities

APPLICABILITY

Maritime facilities with approved Facility Security Plans (FSP) under MTSA are required to perform annual exercises of their plans as described in 33 CFR Part 105.220. Plan holders may satisfy this requirement by voluntary and substantial participation in a U. S. Coast Guard Captain of the Port (COTP) sponsored Area Maritime Security (AMS) Plan exercise when one is scheduled in their area.

FREQUENCY

Per 33 CFR 105.220 (c), exercises must be conducted at least once each calendar year with no more than 18 months between exercises.

INITIATING AUTHORITY AND PARTICIPANTS

If no AMS Plan exercise is scheduled by the U. S. Coast Guard COTP for their area within the period that the annual exercise of their FSP plan is required, facility owner/operators with approved FSPs must design and execute an exercise of their own or participate in a group exercise under the auspices of another industry, port authority or governmental group.

OBJECTIVES

Exercises must be designed to be facility specific or part of a cooperative exercise program that exercises applicable facility and vessel security plans or comprehensive port exercises. The exercise should validate the adequacy of:

- 1) response to a changes in MARSEC Levels;
- 2) procedures for interfacing with vessels at the facility;
- 3) Declarations of Security (DoS);
- 4) communications;
- 5) security measures for access control;
- 6) security measures for restricted areas;
- 7) security measures for handling cargo;
- 8) security measures for delivery of vessel stores and bunkers;
- 9) security measures for monitoring; and
- 10) security incident procedures.

CERTIFICATION

Self-certification

EVALUATION

Self-evaluation

RECORDS

Per 33 CFR Part 105.225, records of exercises must be retained by the Facility Security Officer (FSO) for U. S. Coast Guard review for a period of two (2) years. The record should include the date the exercise was held, a description of the exercise, a list of participants, and any best practices or lessons learned which may improve the FSP.

CREDIT

Exercises of FSPs under 33 CFR Part 105.220 are self-credited and, therefore, provide broad latitude to plan holders in establishing how they can best test the functional adequacy of their security plan.

Plan holders may take credit for having performed the exercise if all objectives of the exercise are met, the exercise is evaluated, and a proper record is generated. 33 CFR Part 105.220 (c) (4) and (5) outline the minimum requirements for an exercise to meet the intent of the regulation; specifically the exercise must be a full and comprehensive test of the facility's communication capabilities, notification procedures, elements of coordination, resource availability, and response in the event of an incident.

Plan holders with approved FSP's covering more than one facility as allowed in 33 CFR Part 105. 410 (d) are required to conduct one exercise for the total plan with each covered facility exercising the facility-specific sections relevant to notifications, communications, and response to the exercised incident.